



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Kimble Sanitary Landfill, Dover, Ohio

**FROM:** Vicky Mei, Environmental Engineer  
AECAB (IL/IN)

**THRU:** Nathan Frank, Section Supervisor  
AECAB (IL/IN)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Kimble Sanitary Landfill

**Facility Location:** 3596 State Route 39 NW, Dover, Ohio

**Date of Virtual Inspection:** September 16, 2022

**EPA Inspector(s):**

1. Vicky Mei, Environmental Engineer

**Other Attendees:**

1. Grant Kimble, Waste and recycling operations, Kimble Sanitary Landfill
2. Nathan Vaughan, In-house counsel, Kimble Sanitary Landfill
3. Julie Hall, Weaver Consultants
4. Christina Wieg, Frost Brown Todd Attorneys

**Contact Email Address:** [grkimble@kimblecompanies.com](mailto:grkimble@kimblecompanies.com)

**Purpose of Inspection:** Clean Air Act inspection

**Facility Type:** Municipal solid waste landfill

**Regulations Central to Inspection:** 40 C.F.R. Part 62, Subpart OOO – Federal Plan Requirements for Municipal Solid Waste Landfills that Commenced Construction On or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 17, 2014

**Arrival Time:** 10:00 AM CST  
**Departure Time:** 10:50 AM CST

**Inspection Type:**

- ☐ Unannounced Inspection
- ☒ Announced Inspection

**OPENING CONFERENCE**

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet
- ☐ Small Business Resource Information Sheet not provided
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Kimble staff and representatives unless otherwise noted. The inspection was conducted virtually.

**Process Description:**

The facility has a total of about 200 gas collection wells and a 3,000-cubic feet per minute (cfm) open flare with a 3,000-cfm blower. The current landfill gas flow rate is less than 2,000 cfm. There are leachate collectors and 6 leachate sumps. Majority of the waste received is municipal solid waste with some construction and demolition waste, special waste, and nondegradable waste. The special waste consists of industrial and solidified waste. The nondegradable waste consists of clay, earthen materials, drill cuttings, and sludges. The older parts of the landfill were capped in the 1980's and produces minimal amounts of landfill gas. Most of the landfill is under interim cover and the active filling area is about 10 to 12 acres. The daily cover is dirt.

**Staff Interview:**

The facility started receiving waste in 1956. The facility installed a voluntary gas collection and control system in 2009. The facility finalized a tier 2 sampling test report, dated March 26, 2020, that demonstrated that the nonmethane organic compounds emission rate is above 34 megagrams per year, requiring the facility to install and start up a collection and control system that is compliant with 40 C.F.R. Part 62, Subpart OOO. The facility will have a compliant system operating by October 1, 2022. The facility has been drilling an additional 90 wells since April 1, 2020. A permit for a gas scrubbing system is currently under review. The performance test of the flare will be conducted 180 days from October 1, 2022. The gas collection and control design plan was partially approved by Ohio EPA. The operations alternatives in the gas collection and control design plan were deferred by Ohio EPA to EPA for review. The facility does not plan to resubmit an updated gas collection and control design plan. The facility does not plan to submit the alternative requests to EPA yet. There have not been any subsurface oxidation events in the past 5 years. No wells are above 145°F.

## **TOUR INFORMATION**

**EPA Tour of the Facility:** No

### **Data Collected and Observations:**

EPA reviewed the facility's gas collection and control system design plan, dated April 1, 2021, and Tier 2 gas sampling testing report, dated March 26, 2020.

**Photos and/or Videos:** were not taken during the inspection.

**Field Measurements:** were not taken during this inspection.

## **RECORDS REVIEW**

1. Tier 2 report, dated March 26, 2020
2. Tier 2 laboratory test results, dated January 28, 2020
3. Ohio EPA's partial approval of the gas collection and control system, dated June 2, 2022
4. Gas collection and control design plan, dated April 1, 2021

## **CLOSING CONFERENCE**

☒ Provided U.S. EPA point of contact to the facility

### **Requested documents:**

- Current gas collection and control system map with areas under different covers
- Surface emission monitoring report if the monitoring will occur in October
- October gas flow rate data
- Annual reports for 2018 – 2021
- Tier 2 test plans and reports for 2016 and 2020

**Concerns:** Per 40 CFR 62.16714(b)(2)(i), the active collection system must be designed to handle the maximum expected gas flow rate from the entire area of the landfill that warrants control over the intended use period of the gas control system equipment, but Kimble's expected gas flow rate for 2022 is 3,690 scfm, whereas the available control capacity is only 3,000 cfm from the open flare.

## **DIGITAL SIGNATURES**

Report Author: \_\_\_\_\_

Section Supervisor: \_\_\_\_\_